

As a small employer in Oregon, thank you for the opportunity to provide feedback on the proposed rules to implement Oregon's new minimum wage law.

I am concerned that the proposed minimum wage rules fall outside of the scope of BOLI's rulemaking authority. The rules do not align with the intent of Oregon's legislators nor are they consistent with the federal Family & Medical Leave Act (FMLA). These inconsistencies create new recordkeeping, costs, and potential conflict in the workplace that further increases the cost and difficulty of employing people in my community.

As a [insert type of business], I am my own HR department/I have a small HR department. I do not have the resources or the time to manage the record-keeping burden proposed by the draft rules. Each new mandate has a cumulative effect on my ability to maintain my business or desire to hire workers.

I respectfully ask BOLI to define "employer location" for the purposes of minimum wage as the location where an employee reports to work, or from which they receive work assignments.

Trying to ascertain the amount of time spent by employees in other wage tiers for purposes of paying higher wages for portions of an employee's workweek is unduly burdensome and has the ability to create conflict in the workplace. Please simplify the rules for small businesses by removing burdensome tracking and reporting requirements.